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CLERK US DISTRICT COURT  
 DISTRICT OF NEVADA

BY \_\_\_\_\_ DEPUTY

Ronnie Blanch

Name

330 S. Casino Cntr Blvd.

Las Vegas, NV, 89101

1195555

Prison Number

Plaintiff, Pro Se

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

Ronnie Blanch

Plaintiff,

vs.

LVMPD

3054 Costello #9/39

Defendant(s).

2:14-cv-01762-GMN-VCF

CIVIL RIGHTS COMPLAINT  
 PURSUANT TO  
 42 U.S.C. § 1983

"Jury Trial Demanded"

A. JURISDICTION

- 1) This complaint alleges that the civil rights of Plaintiff, Ronnie Blanch,  
 (Print Plaintiff's name)

who presently resides at 330 S. Casino Cntr. Blvd were

violated by the actions of the below named individuals which were directed against

Plaintiff at Las Vegas, Nevada on the following dates  
 (institution/city where violation occurred)

4th Constitutional  
right (Count I)

(Count II)

(Count III)

I

Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants

2) Defendant JOSE COSTELLO resides at N/A  
(full name of first defendant) (address if first defendant)  
and is employed as DETECTIVE GALT CRIME BEHAVIOR This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: OFFICER OF L.V.M.P.D.  
AGGRESSIVE AUTHORITY HOSTILE

3) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

4) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

5) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_

6) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
 (full name of first defendant) (address if first defendant)  
 and is employed as \_\_\_\_\_. This defendant is sued in his/her  
 (defendant's position and title, if any)  
 \_\_\_\_\_ individual \_\_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
 acting  
 under color of law: \_\_\_\_\_

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

ALLEN V US. 2013 2013 WL 4049066 MOST  
KATZ V UNITED STATES 389 U.S. 347, 19 L. Ed 2d 576 (1970)  
CALIFORNIA V. HODARPO 111 S. Ct 1547 (1991)

#### B. NATURE OF THE CASE

1) Briefly state the background of your case.

JUNE -18-2014 I WAS ILLEGALLY SEARCHED  
AND SEIZED BY J. COSTELLO AND SERGEANT CONK  
VIOLATING MY CONSTITUTIONAL RIGHTS  
THEY SHOWED AGGRAVATION BY PLACING ME  
IN A TACTICAL RESTRAINING ME FROM  
MOVING IN A WAY THAT ANY REASONABLE  
PERSON WOULD HAVE BELIEVED THEY WERE  
NOT FREE TO LEAVE  
DET. COSTELLO TESTIFIED DURING THIS EXCHANGE  
HE AND SERGEANT CONK WERE POSITIONED  
AROUND DEFENDANT IN WHAT DET. COSTELLO  
DESCRIBED AS A TACTICAL

#### C. CAUSE OF ACTION

## COUNT I

The following civil rights has been violated: 4th Amendment  
of the Constitution

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

I WAS seized BY officer J. Costello  
 OF LVMPD AND HIM AND  
 HIS SERGEANT PLACED me IN  
 A TACTICAL L IN SUCH A  
 MANNER I BELIEVED I HAD TO  
 SUBMIT TO THE OFFICERS IN  
 THERE AUTHORITY MANNER  
 MY PATH WAS BLOCKED BY  
 OFFICER COSTELLO WHILE THE OTHER  
 CIRCLED BEHIND me IN A  
 WAY THAT A REASONABLE PERSON  
 WOULD BELIEVE they were NOT  
 FREE TO LEAVE  
 J. Costello ILLEGALLY STOPPED AND  
 DETAINED me ILLEGALLY SEARCHED me  
 AND ILLEGALLY SEIZED me

COUNT II

The following civil rights has been violated: MY CONSTITUTIONAL  
RIGHT TO FREE MOVEMENT AND FREE  
ASSEMBLY

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

I WAS STOPPED BY OFFICER  
J COSTELLO who stopped in  
FRONT OF MY BIKE while ASKING  
TO SPEAK WITH ME He ASKED TO  
SEARCH FOR WEAPONS ON MY  
PERSON I STATED I HAVE A LEGAL  
POCKET KNIFE IN MY LEFT POCKET  
AND I WILL RETRIEVE IT He PUT  
ME IN CUFFS AND Illegally  
SEARCHED MY PERSONS

Illegally stopped me from CONTINUING  
ON MY PATH

SEE CONTINUANCE

CONTINUANCE  
CONUNT 2  
Supporting facts.

(1)

July 7th 2014

Officer Josh Costello

Testified that I gave him

consent to search me for weapons

under oath but during cross examination

by Seth Gutierrez changed his testimony

to weapons & drugs also stating I consented

to a pat down then changing his testimony

to saying it was consent for weapons.

But HPS arrest report claims I consented

to weapons & drugs. the officer doesn't

know what I consented to because there

was no consent also during his

testimony officers stated that I

did not look threatening at no time

during our encounter but 20 to 30 seconds

upon initial contact I was placed in a

tactical L before officers asked if I

had any weapons on me. officer stated

that at no time did I pose a threat

to them but was placed in a tactical

L for officer safety.



#2

I HAVE my PRELIMINARY  
TRANSCRIPT  
TO SHOW THE COURTS  
HOW THE OFFICERS IN  
THEIR AUTHORITY MANNER  
DETAINED ME CHANGED  
HIS TESTIMONY UNDER OATH.

HE NEVER





outline).

- a) Defendants: \_\_\_\_\_
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted**?  
 \_\_\_ Yes X No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_ frivolous  
 \_\_\_ malicious or \_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
 \_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
 \_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
 \_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
 \_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ☒ Yes ☐ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_\_\_ disciplinary hearing; (2) ☒ state or federal court decision; (3) \_\_\_\_\_ state or federal law or regulation; (4) \_\_\_\_\_ parole board decision; or (5) \_\_\_\_\_ other \_\_\_\_\_.

If your answer is "Yes", provide the following information. Grievance Number 14-138

Date and institution where grievance was filed CLARK COUNTY DETENTION CENTER  
SEPTEMBER 8-2014

Response to grievance: CITIZEN REVIEW BOARD

A panel OF THE CITIZEN REVIEW BOARD WILL  
REVIEW my complaint AFTER INTERNAL AFFAIRS INVESTIGATIVE  
CASE # 14-138 REPORT

C.R.B.  
 Receipt

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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

MONETARY AND PUNITIVE DAMAGES  
ACTUAL DAMAGES  
PAIN & SUFFERING  
MENTAL ANGUISH

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

Ronnie Blanch

(Name of Person who prepared or helped  
prepare this complaint if not Plaintiff)



(Signature of Plaintiff)

10-11-2014

(Date)

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(Additional space if needed; identify what is being continued)